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8 (Admitted *pro hac vice*)

9 Attorneys for Defendant
10 Quail Valley Water District

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HILLCREST INVESTMENTS, LTD., a
foreign corporation; HILLCREST
PROJECTS, LLC., a foreign limited liability
company;

Plaintiffs,

v.

CHICAGO TITLE INSURANCE
COMPANY, a foreign entity; QUAIL
VALLEY WATER DISTRICT, a foreign
entity; 11239, LLC, a foreign entity;
R.A.M.M. CORP., a Nevada Corporation;

Defendants.

Case No. 2:22-cv-00406-RFB-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT TO RESPOND TO
COMPLAINT
(Fourth Request)**

Defendant, Quail Valley Water District, (“Defendant”) by and through its counsel of record, Daniel N. Raytis, Esq., of Belden Blaine Raytis, LLP (admitted *pro hac vice*) and Plaintiffs, Hillcrest Investments, Ltd. and Hillcrest Projects, LLC (“Plaintiffs”), by and through their counsel of record, Mitchell S. Bisson, Esq., hereby jointly submit this stipulation and order to extend Defendant’s deadline to file its response to the Complaint (ECF No. 1, served on April 20, 2022), to thirty (30) days after entry of this Order.

This is the parties’ fourth request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

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1 Defendant is an out-of-state entity. Defendant's counsel was permitted to appear *pro hac*
2 *vice* in this matter by an Order of the Court on June 15, 2022. The parties request this extension in
3 order to provide Defendant with additional time to obtain documents, materials and information
4 relevant to Plaintiff's claims alleged against Defendant in order to respond to the Complaint and/or
5 discuss settlement of the same.

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7 Dated: September 12, 2022

BELDEN BLAINE RAYTIS, LLP

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9 By: /s/Daniel N. Raytis
10 DANIEL N. RAYTIS
11 Attorneys for Defendant Quail Valley
12 Water District

13 Dated: September 12, 2022

14 THE LAW OFFICES OF MITCHELL
15 S. BISSON


16 By: /s/Mitchell S. Bisson
17 MITCHELL S. BISSON, ESQ.
18 Attorney for Plaintiffs

19 **ORDER**

20 Based upon the stipulation of the parties, and good cause appearing,

21 **IT IS SO ORDERED.** IT IS FURTHER ORDERED that the response to the complaint must
22 be filed on or before October 19, 2022.

23 Dated this 19th day of September, 2022.

24 
25 **UNITED STATES MAGISTRATE JUDGE**
26 **Case No. 2:22-cv-00406-RFB-VCF**
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Case No. 22:cv-00406

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF KERN

I am employed in the County of Kern, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 5016 California Ave., Suite 3, Bakersfield, CA 93309. My email address is heather@bbr.law.

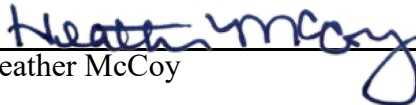
On **September 12, 2022**, I served the following document(s) described as

on the interested parties in this action via electronic service through the Court's Electronic File/Service Program.

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| Mithcell S. Bisson, Esq. Law Office of Mitchell S. Bisson 911 N. Buffalo Drive, Suite 201 Las Vegas, NV 89128 mbisson@bissonlegal.com | Attorney for Plaintiffs Hillcrest Investments, LTD |
| Natalie C. Lehmana, Esq. Fidelity National Law Group 8363 W. Sunset Road, Ste. 120 Las Vegas, NV 89113 Natalie.lehman@fnf.com | Attorneys for Defendant Chicago Title Insurance Company |

Executed on **September 12, 2022**, at Bakersfield, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.


Heather McCoy